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## COLORADO DEPARTMENT OF HEALTH

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Denver, Colorado 80220  
Phone (303) 320-8333

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Roy Romer  
Governor

Thomas M. Vernon, M.D.  
Executive Director

March 14, 1989

Rocky Flats Area Office  
U.S. Department of Energy  
P.O. Box 928  
Golden, Colorado 80402

REFER TO	
<input checked="" type="checkbox"/>	Area Mgr.
<input type="checkbox"/>	Dep. Area Mgr.
<input type="checkbox"/>	Counsel
<input type="checkbox"/>	CH. Admin. Gr.
<input type="checkbox"/>	CH. FM Br.
<input type="checkbox"/>	CH. Cpr. Br.
<input type="checkbox"/>	CH. QA Br.
<input checked="" type="checkbox"/>	CH. S2EE Br.
<input checked="" type="checkbox"/>	CH. SREP Br.
<input type="checkbox"/>	CH. SES Br.
<input type="checkbox"/>	Proj. Mgr. FRMP
<input type="checkbox"/>	Duane Catlett

Attn: Mr. Albert E. Whiteman, DOE Area Manager  
Mr. Dominic J. Sanchini, President & General Manager  
Rockwell International

Dear Messrs. Whiteman and Sanchini:

The Colorado Department of Health, Hazardous Materials and Waste Management Division ("the Division") has reviewed the meeting minutes from the January 13, 1989 Solar Pond Closure meeting which were submitted to the Division on February 9, 1989. The minutes are generally in agreement with the Division's understanding of the discussion at the Solar Ponds meeting. Certain items are in error, however, and are submitted here for DOE correction.

- Item No. 9 The Division does not agree that the Solar Pond point of compliance (POC) is located at the french drain. While there have been proposals to change the POC to the french drain, the Division continues to recognize the POC for the Solar Ponds as the outer edge of the northern containment dike.
- Item No. 14 The Division disagrees with the statement that the Professional Engineer certifying closure need not be registered in the state of Colorado. The Professional Engineer certifying closure at the Solar Ponds must be registered in the state of Colorado.
- Item No. 15 Any variation in the locations suggested for the necessary additional monitoring wells should be discussed with the Division prior to actual well siting.
- Item No. 16 The rationale for using a "variability factor" of three is based on DOE/Rockwell engineering judgment and is not necessarily accepted by the Division.
- Item No. 19 The proposed risk assessment might provide the proposed basis for a Solar Pond cleanup standard. The acceptability of a risk assessment approach to Solar Pond closure is still being evaluated by the Division.

ADMIN RECORD

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Rocky Flats Area Office  
Mr. Whiteman, Sanchini  
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Item No. 21    The source(s) of contamination associated with alluvial well 12-86 is unknown. However, it is likely that contamination is associated with the Solar Ponds. Ponds B-2 and B-3 are also potential sources, but are by no means the only likely source of the contamination at well 12-86.

Please contact George Dancik at (303) 331-4842 if you have any questions of the above items, or if further clarification is necessary.

Sincerely,



Gary W. Baughman, Unit Leader  
Hazardous Facilities Unit  
Hazardous Materials & Waste Management Division

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